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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS OPPOSITION TO
WAYMO LETTER BRIEF RE
OUTSTANDING DISCOVERY ITEMS**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Uber Technologies, Inc. and
7 Ottomotto LLC’s Administrative Motion to File Under Seal Their Opposition to Waymo Letter Brief
8 Re Outstanding Discovery Items (the “Administrative Motion”). The Administrative Motion seeks an
9 order sealing highlighted portions of Exhibits B, I-K, and M-O to the Declaration of Esther Chang, as
10 well as the entirety of Exhibits E, G-H, and L thereto.

11 3. Exhibits G-H (portions marked in red boxes in version filed herewith) contain email
12 addresses and/or phone numbers of Google and Waymo employees and/or former employees involved
13 in this case, the disclosure of which would cause Waymo and those employees substantial harm due to
14 the high public profile of this litigation. Waymo seeks to seal this information.

15 4. Waymo’s request to seal is narrowly tailored to those portions of Exhibits G-H that
16 merit sealing.

17
18 I declare under penalty of perjury under the laws of the State of California and the United
19 States of America that the foregoing is true and correct, and that this declaration was executed in San
20 Francisco, California, on January 8, 2018.

21 By /s/ Felipe Corredor

22 Felipe Corredor
23 Attorneys for WAYMO LLC

24 **ATTESTATION**

25 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
26 document has been obtained from Felipe Corredor.

27 By: /s/ Charles K. Verhoeven
28 Charles K. Verhoeven

Exhibit G

**UNREDACTED
VERSION
OF DOCUMENT
SOUGHT TO BE
SEALED**

From: Jolie Sorge [REDACTED]
To: Michael Pfyl [REDACTED] Judy Gilbert [REDACTED] Chelsea Bailey [REDACTED]
Michael Xing [REDACTED] Christine Flores [REDACTED]
Sent: Mon, 27 Oct 2014 09:38:33 -0700
Subject: Fwd: Anthony [confidential]

Attorney Client Privileged

+ Christine (so she is in the loop when she gets back from holiday)

Hi Micheal, Mike and Judy,

REDACTED - PRIVILEGE

----- Forwarded message -----

From: Chris Urmson [REDACTED]
Date: Mon, Oct 27, 2014 at 7:08 AM
Subject: Fwd: Anthony [confidential]
To: Chelsea Bailey [REDACTED] Jolie Sorge [REDACTED]

Can I share with Clay Anthony's comp situation. I think it is important, along with the performance challenges.

Chris

----- Forwarded message -----

From: "Clay Bavor" [REDACTED]

Date: Oct 27, 2014 7:04 AM

Subject: Anthony [confidential]

To: "Christopher Urmson" [REDACTED]

Cc:

Hi Chris,

I spoke with Anthony last night. It sounds like he is ready to move on from Chauffeur to work on VR / robot stuff. To his credit, he also let me know that the situation is not exactly straightforward, and that you were considering putting him on a performance plan.

Can you give me a bit of color for why? Should I be concerned?

Happy to talk by phone if that is easiest. Text me any time you are free and I will step out of what I'm doing. [REDACTED]

Thanks.

Clay

Exhibit H

**UNREDACTED
VERSION
OF DOCUMENT
SOUGHT TO BE
SEALED**

From: Chelsea Bailey [REDACTED]
To: Judy Gilbert [REDACTED]
Sent: Mon, 27 Oct 2014 12:37:06 -0700
Subject: Re: Anthony [confidential]
Cc: Michael Xing [REDACTED] Michael Pfyl [REDACTED] Christine Flores [REDACTED]
Jolie Sorge [REDACTED]

Privileged and confidential

REDACTED - PRIVILEGE

Please advise.

On Mon, Oct 27, 2014 at 11:48 AM, Judy Gilbert [REDACTED] wrote:

Privileged and confidential

REDACTED - PRIVILEGE

Please advise.

On Mon Oct 27 2014 at 10:29:39 AM Michael Xing [REDACTED] wrote:

REDACTED - PRIVILEGE

On Mon, Oct 27, 2014 at 9:53 AM, Michael Pfyl [REDACTED] wrote:

Answers inline.

On Mon, Oct 27, 2014 at 9:38 AM, Jolie Sorge [REDACTED] wrote:

Attorney Client Privileged
+ Christine (so she is in the loop when she gets back from holiday)

Hi Micheal, Mike and Judy,

REDACTED - PRIVILEGE

----- Forwarded message -----

From: **Chris Urmson** [REDACTED]

Date: Mon, Oct 27, 2014 at 7:08 AM

Subject: Fwd: Anthony [confidential]

To: Chelsea Bailey [REDACTED] Jolie Sorge [REDACTED]

Can I share with Clay Anthony's comp situation. I think it is important, along with the performance challenges.

Chris

----- Forwarded message -----

From: "Clay Bavor" [REDACTED]

Date: Oct 27, 2014 7:04 AM

Subject: Anthony [confidential]

To: "Christopher Urmson" [REDACTED]

Cc:

Hi Chris,

I spoke with Anthony last night. It sounds like he is ready to move on from Chauffeur to work on VR / robot stuff. To his credit, he also let me know that the situation is not exactly straightforward, and that you were considering putting him on a performance plan.

Can you give me a bit of color for why? Should I be concerned?

Happy to talk by phone if that is easiest. Text me any time you are free and I will step out of what I'm doing.

[REDACTED - PRIVACY]

Thanks.

Clay

--

Chelsea Bailey

[REDACTED]